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November 11, 2020

BY ELECTRONIC FILING

The Honorable Jesse Furman
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Ayon, 18-cr-269 (JMF)

Dear Judge Furman:

I am a partner at Kostelanetz & Fink, LLP. I have agreed to represent Ramiro Ayon on a pro bono basis, along with Julia Gatto of the Office of the Federal Defenders of New York, Inc., in connection with Mr. Ayon's motion for compassionate release pursuant to 18 U.S.C. § 3582(c)(1)(A). I write the Court to respectfully request a one-week adjournment of the deadline to file Mr. Ayon's compassionate release motion.

On October 5, 2020, Your Honor granted Mr. Ayon's request for a forty-five day adjournment of the time to file a compassionate release motion in order to permit Mr. Ayon to request relief from the warden of his facility and to enable counsel to obtain records relevant to the motion. His motion is currently due on Monday, November 16, 2020.

Mr. Ayon has since made his request to the warden of his facility. However, communicating with Mr. Ayon about his motion has proven challenging, especially with COVID protocols implemented at his facility. For instance, counsel has been unable to schedule a call with Mr. Ayon this week to discuss his motion prior to filing it. In light of the foregoing, we respectfully request a one-week adjournment, until November 23, 2020, to file Mr. Ayon's motion.

I have communicated with the government, who consents to this request.

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For the foregoing reasons, I respectfully request an extension until November 23, 2020 to file a compassionate release motion on Mr. Ayon's behalf.

Respectfully,

/s/ Christopher M. Ferguson
Christopher M. Ferguson (CF4120)

cc: AUSA Sebastian Swett (via ECF)
Julia Gatto, Esq. (via ECF)

Application GRANTED. All deadlines are hereby extended by a week. The Clerk of Court is directed to terminate ECF No. 101.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jesse Furman', is written over the text 'SO ORDERED.' and the date.

November 12, 2020